

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 v.)
)
TIMOTHY PAUL BROWN, JR.)
DANIEL THOMAS NOLDER, JR.)

Criminal No. 15-77
[UNDER SEAL]

U.S. DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
2015 APR - 1 11:14 AM

MOTION FOR ARREST WARRANTS

AND NOW comes the United States of America, by its attorneys, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Cindy K. Chung, Assistant United States Attorney for said district, and, pursuant to Rule 9 of the Federal Rules of Criminal Procedure, respectfully moves the Court to issue an Order directing that Arrest Warrants be issued for the apprehension of defendants TIMOTHY PAUL BROWN, JR., and DANIEL THOMAS NOLDER, JR., upon the grounds that an Indictment has been returned in the above-captioned criminal case charging the defendants with: Possession of a Firearm by a Convicted Felon, in violation of Title 18, United States Code, Section 922(g)(1) (Timothy Paul Brown, Jr.); Possession of a Stolen Firearm, in violation of Title 18, United States Code, Section 922(j) (both defendants); and Using, Carrying, or Possessing a Firearm During and in Relation to a Drug Trafficking Crime, in violation of Title 18, United States Code, Section 924 (c)(1)(A)(i) (Timothy Paul Brown, Jr.).

Recommended bond: Detention as to Defendant Timothy Paul Brown, Jr.

\$20,000.00 unsecured bond for Defendant Daniel Thomas Nolder, Jr.

Respectfully submitted,

DAVID J. HICKTON
United States Attorney

By: 

CINDY K. CHUNG
Assistant U.S. Attorney
PA ID No. 317227